DEC 12 1986

Richard Merritt Information Officer Arkansas Department of Pollution Control and Ecology 8001 National Drive Little Rock, Arkansas 72209

Dear Richard:

Enclosed is the rough draft of the Community Relations Plan for the Arkwood site near Omaha. Your comments would be appreciated. Sincerely,

Ellen D. Greeney Superfund Community Relations

Enclosure

John Ward cc: Arkansas Department of Pollution Control and Ecology

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CONCURRENCES							
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SECTION 2 - REMEDIAL INVESTIGATION SCOPE OF WORK

The RI for the Arkwood site consists of seven tasks:

Task 1 - Description of Current Situation

Task 2 - Plans and Management

Task 3 - Site Investigation

Task 4 - Site Investigation Analysis

Task 5 - Laboratory and Bench-Scale Studies

Task 6 - RI Reporting Requirements
Task 7 - Community Relations Support

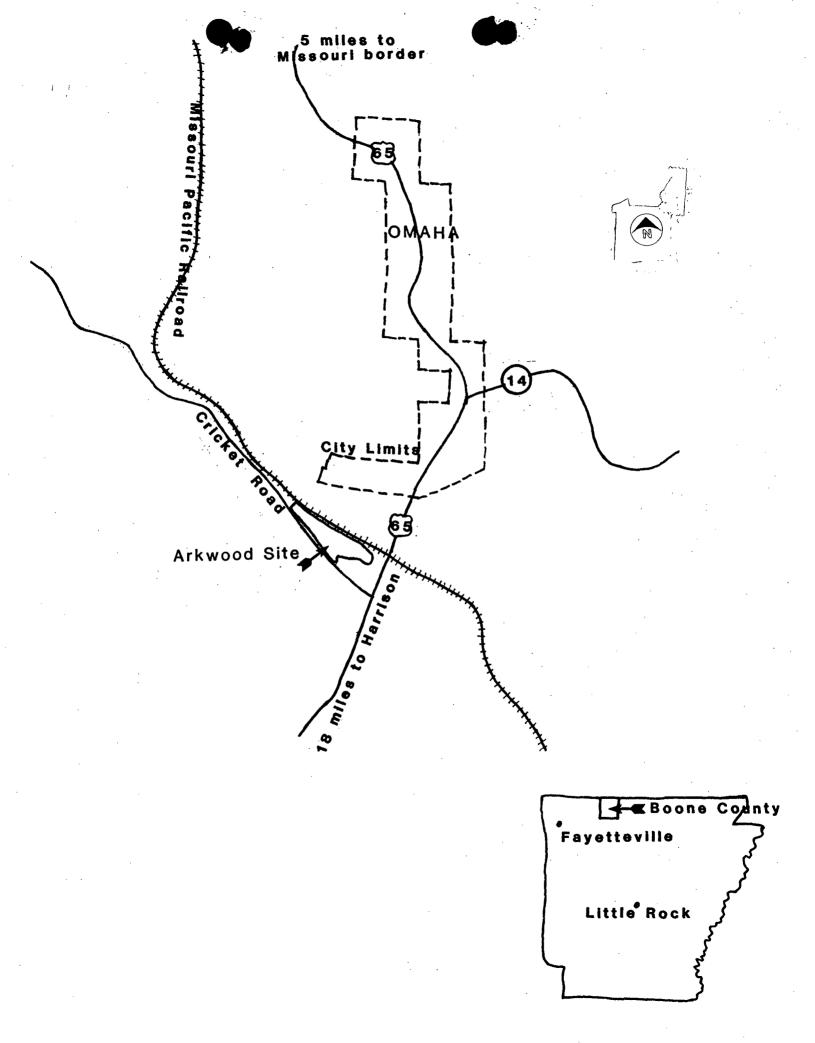
2.1 Task 1 - Description of Current Situation

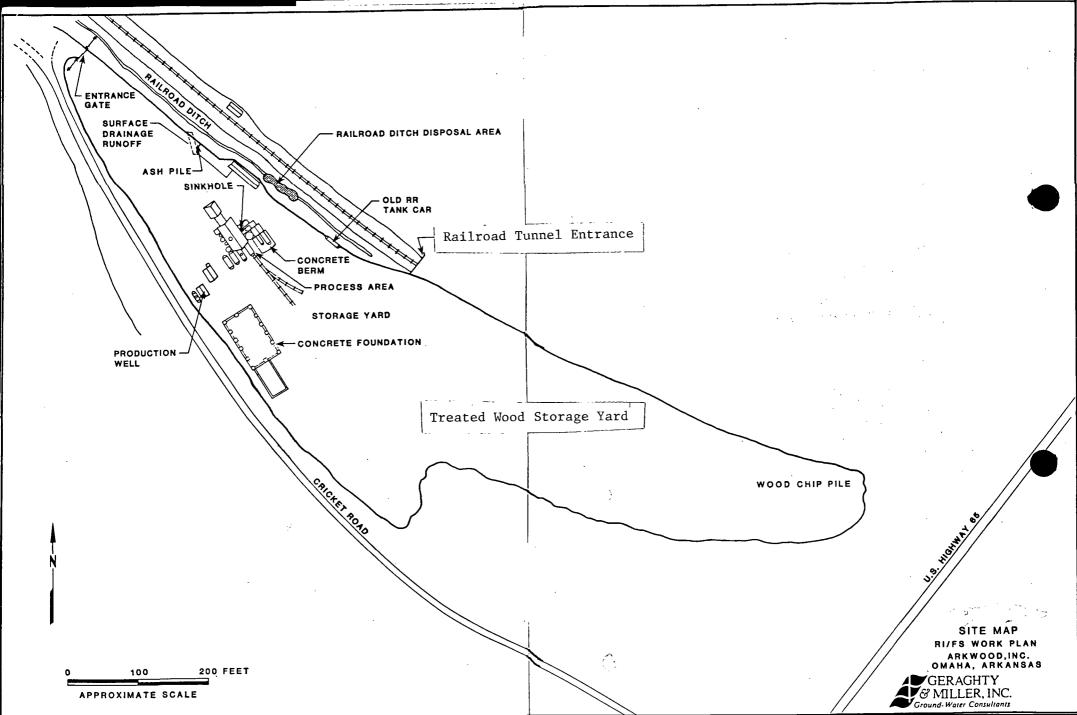
2.1.1 Site Background

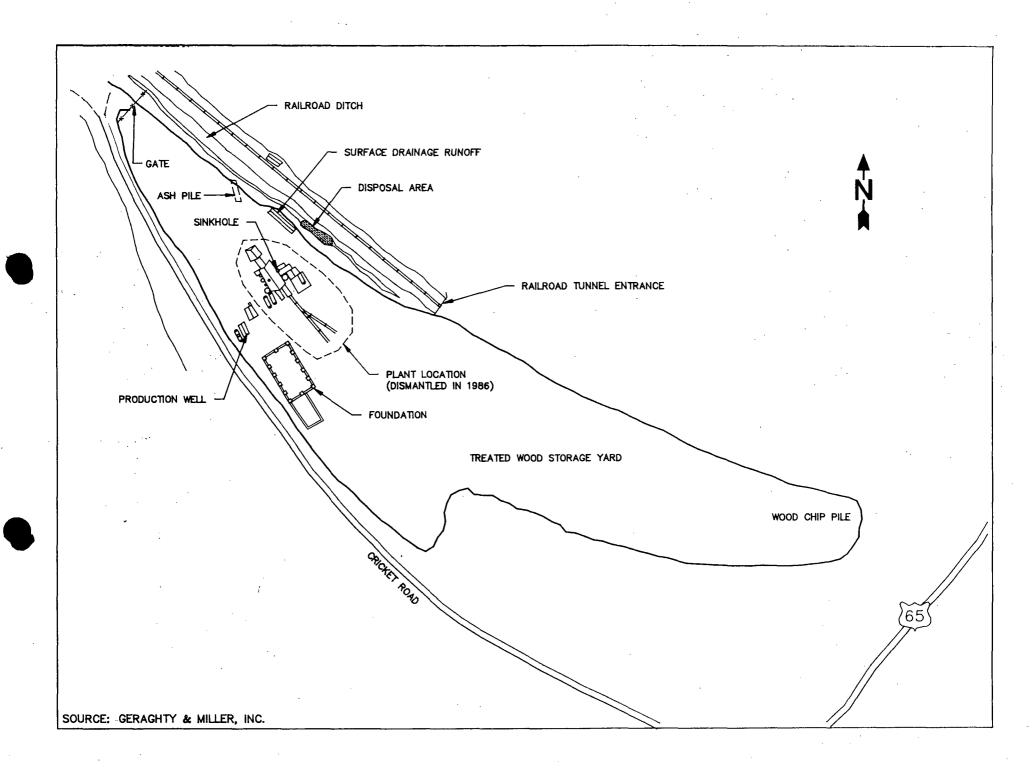
2.1.1.1 Site Description

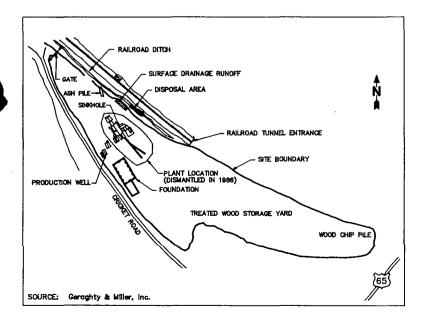
The Arkwood site is located west of U.S. Highway 65, one-half mile southwest of Omaha, Boone County, Arkansas, as shown in Figure 2-1. The Arkwood site is located in an excavated area at the head of a valley approximately 1,000 feet west of U.S. Highway 65, as shown in Figure 2-2.

The site covers a total of 15 acres that were used for treating wood and storage of materials. A branch line of the Missouri Pacific Railroad runs across the northern edge of the property. To the south and west the site is bounded by an unpaved road. Highway 65 borders the site to the east. An aerial photograph of the site as it was in February, 1984, is shown in Figure 2-3.









2.1.1.2 Site History

The plant site was developed in the early 1900's when the railroad company excavated to a depth of 40 to 50 feet below natural grade to obtain fill dirt for the construction of the railroad embankment. The Arkwood Plant was built in the 1960's. The assets of Arkwood, Inc. were acquired by MMI in 1973. The land and treating facilities located at the Arkwood plant were leased by MMI from Mr. Ormond. The facility operated from 1973 until the plant ceased treatment operations in June, 1984, at which time MMI sold or removed remaining inventory and process materials. In January, 1985, the 12-year lease expired. A chronology of events is provided in Appendix A.

Mr. Bob Barker was the Arkwood Plant Manager from 1970 to 1973 and General Manager from 1973 to 1984. Mr. Barker is the source of operational information in this document.

2.1.1.3 Site Operations and Practices

Two wood preservative mixtures were used at the site. The original wood preservative used was a mixture of 50% creosote and 50% No. 6 road oil. For the other, pentachlorophenol (PCP) was mixed with wood treating oil (#3 diesel fuel with a suspension additive) to give a 5% wood treating solution (5% PCP and 95% oil). The preservative mixtures were used in the same manner in the wood treatment

process. Inorganic arsenical wood preservatives were not used at the site.

The treatment process consisted of a single pressure-cylinder in which the wood was treated. Air was forced into the cylinder to a pressure of 80 pounds per square inch (psi).

The increased pressure opened the wood cells for better penetration and helped push out excess oil at the conclusion of the treating cycle. Under pressure, the wood treating mixture was forced into the cylinder. Once the cylinder was full, pressure treating began.

The amount of wood inside the treating cylinder was calculated in cubic feet. Normal treatment for fence posts, as recommended by the American Wood Preserver's Association (AWPA), is to retain 6 pounds of wood treating mixture for each cubic foot of wood treated. The specific gravity of the wood treating mixture is 7.7 to 7.8 pounds per gallon, depending on temperature. Therefore, for each cubic foot of wood in the treating cylinder, the wood must retain 0.77 gallons of wood treating mixture.

As a rule-of-thumb, the wood would retain the proper amount of treatment mixture when 2 1/2 times the calculated required amount of treating mixture was introduced under pressure in the treatment cylinder. After sufficient time

has passed to allow maximum penetration of the treatment chemicals into the wood, the pressure cylinder was drained of preserative and the cylinder was put under a vacuum to draw any excess treatment mixture out of the wood cells. The treatment cylinder was evacuated to a vacuum equal to 25 inches of mercury for a period of 45 minutes to one hour.

The treated materials were then moved from the pressure cylinder and tested for quantity of treatment mixture retained, and the degree of penetration of the wood treatment mixture. The wood was then transported to the yard for storage or shipment. The wood usually had a dry appearance at the end of the treatment process, but some preservative solution may have leached off heavily treated wood as it was transported from the treatment cylinder. This accounts for the visible discoloration of surface soils around the treatment area.

During the early years of operation, few precautions were taken to prevent secondary releases of wood treating solutions to the environment. The waste oil was disposed into a sinkhole located near the treating cylinder room. Disposal to the sinkhole was discontinued prior to 1971.

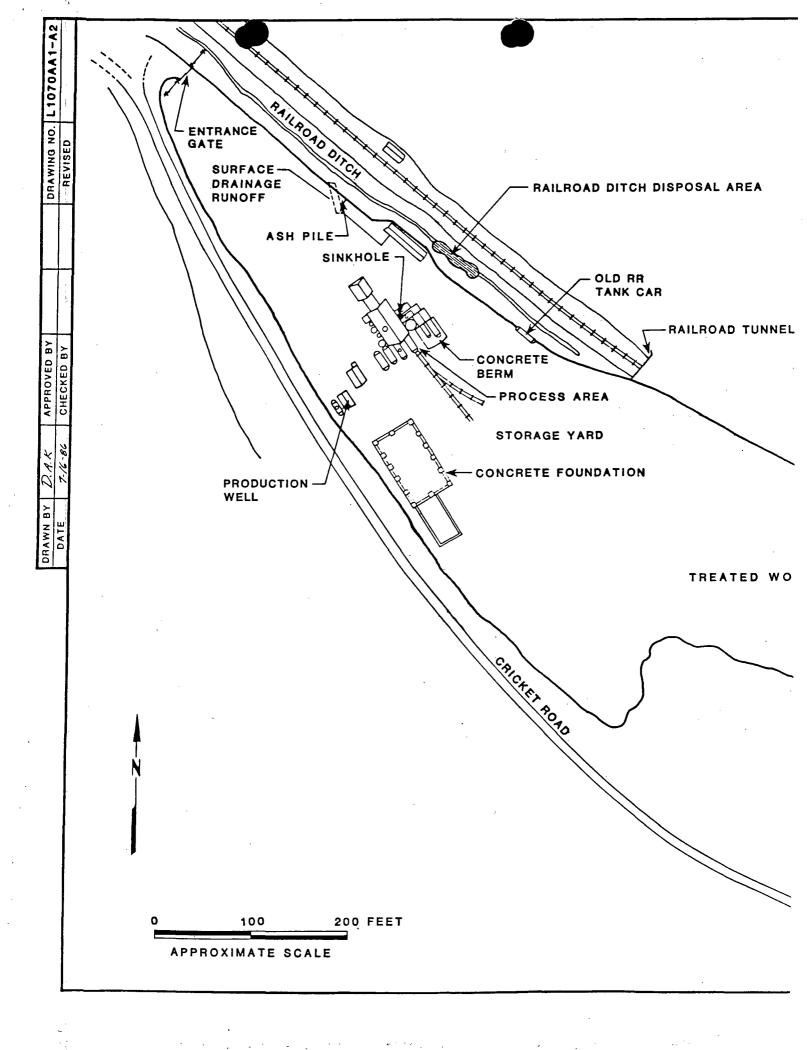
Wastes were disposed in several areas (see Figure 2-4):
(1) a sinkhole; (2) the railroad ditch adjacent to the plant;
(3) in the ash pile (ashes from a wood-fired boiler on-site);

(4) as surficial contamination in process areas (the trolley tracks leading away from the treatment cylinder); (5) as surficial contamination in areas used to store treated wood products; and (6) in a pile of wood chips.

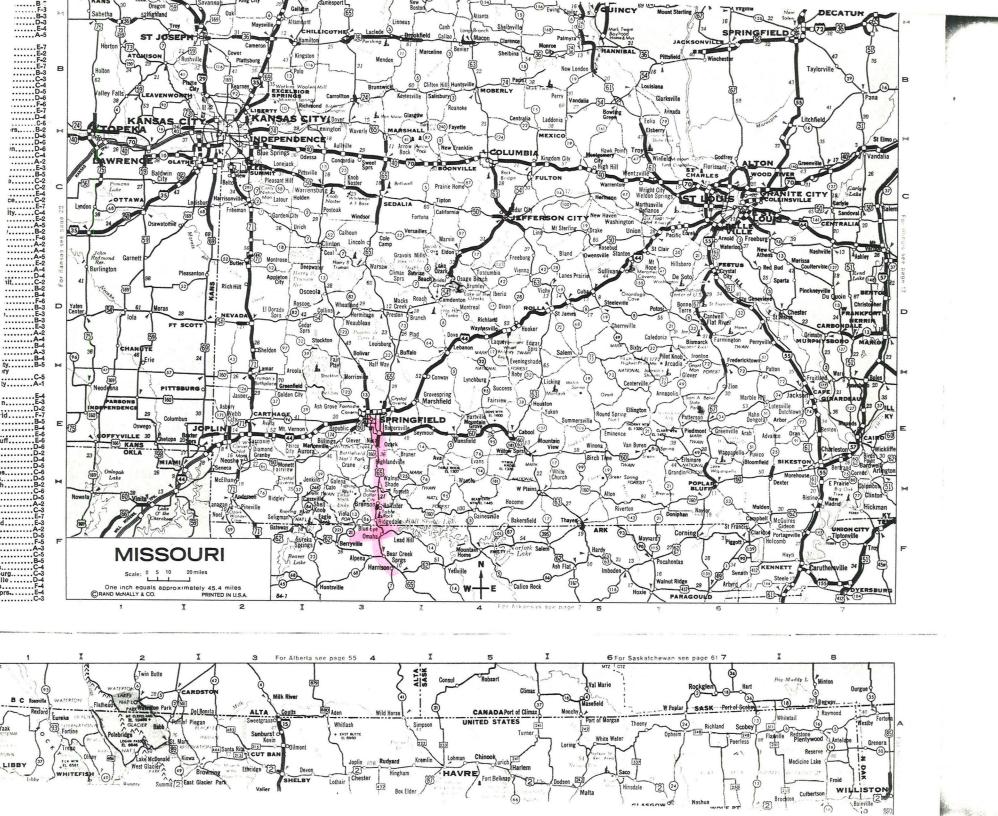
In 1971, the oil sludge was dumped into a ditch located in the railroad right-of-way (north of the treatment cylinder and treating room), and this area now contains sludges as shown in Figure 2-2. Periodically the oily sludge in the ditch would be burned.

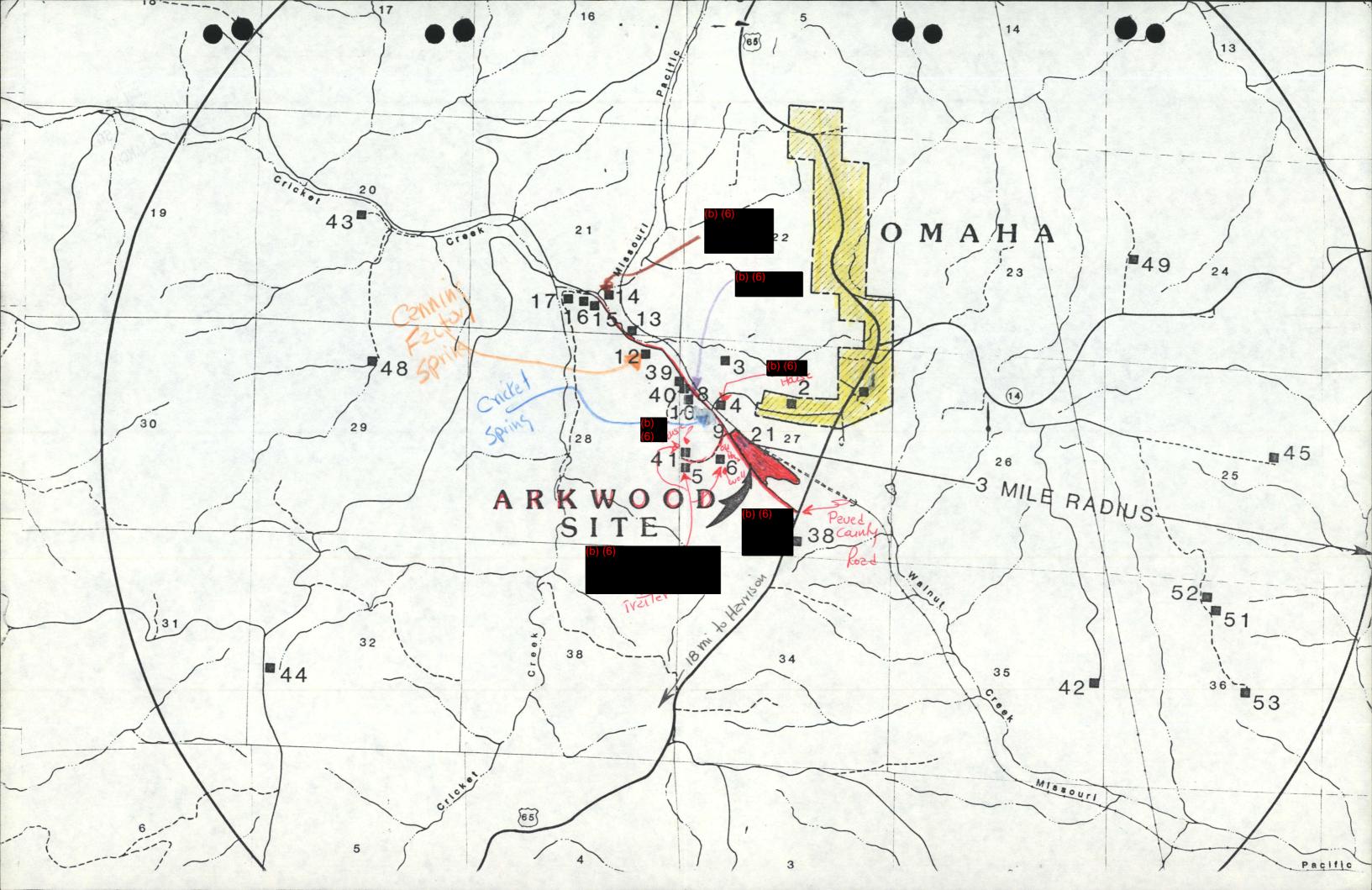
The practice of burning excess waste oil in the railroad ditch was discontinued in 1973. Increasing oil and PCP prices necessitated that more cost-effective methods be used to recover as much of the treatment mixtures as possible. This reduced by 70 to 80% the amounts of waste generated according to Mr. Bob Barker.

Under MMI management, several changes were made in plant operations and waste disposal. The sump drain line was improved to provide for more efficient reuse of oil. The air pressure/vacuum time was increased during treatment process to eliminate/reduce treated wood "bleeding". The sinkhole was cemented over in 1982 with a concrete pad. A concrete berm was added around the storage and separator tanks in the process area. The storage yard was terraced to preclude rain water run-on to process areas.



TRANCE STORAGE YARD WOOD CHIP PILE FIGURE 2-2 SITE MAP RI/FS WORK PLAN ARKWOOD,INC. OMAHA, ARKANSAS GERAGHTY & MILLER, INC.
Ground-Water Consultants 2-3





2.7 Task 7 - Community Relations Support

Prior to initiating site field activities, a community relations plan will be developed. The document will be prepared in accordance with the "Community Relations in Superfund; A Handbook, Interim Version", Environmental Protection Agency, Office of Emergency and Remedial Response, September, 1983.

To date, few community relations activities involving large groups have been conducted at the Arkwood site. The EPA, ADPC&E, and MMI representatives have been in contact with one another and with affected individuals. No public meetings have been held to date.

Organized groups involved with community environmental affairs will be identified. Contact will be established and maintained throughout the remedial action portion of the project. Other interested parties that will be kept abreast of happenings at the site include:

- o Elected representatives, including state and federal representatives and senators;
- o Arkansas Department of Pollution Control and Ecology; and
- Boone County Health Department, Harrison.

Community relations plans generally specify two types of techniques to maintain public awareness and to meet the community relations objectives: (1) providing periodic

progress reports on the findings of the remedial investigation, and (2) eliciting and documenting comments and concerns from citizens, local officials, and community or environmental groups.

The objectives of the community relations plan are to:

- o Ensure that local residents, state and local officials, and concerned groups are notified of major findings, activities and the reasons for these activities and decisions in a timely manner;
- o Provide the media with detailed, accurate information about the remedial investigation and feasibility study;
- o Effectively address citizen inquiries and concerns to ensure that the best possible information is provided. Provide accessible, consistent sources for people to contact and allow an ample time period for the public to respond;
- o Provide local residents and state and local officials with the opportunity to comment on remedial action alternatives identified during the feasibility study; and
- Keep abreast of changes in community concerns, information needs and activities and modify the community relations plan as necessary to address these changes.

performed concurrently with the latter part of the Phase II RI activities and the initial deliberations of the Feasibility Study.

Once the endangerment assessment has been completed, it shall be submitted to the EPA for review and comment. Ten copies of Draft Endangerment Assessment shall be submitted to the EPA for review and approval. The Draft Endangerment Assessment shall be revised as required by the EPA's comments and 10 copies of the Final Endangerment Assessment shall be submitted.

Task 7 - Community Relations Support

Prior to initiating the remaining site activities, a community relations plan will be developed by the McKesson Corporate public relations department and approved. The document will be prepared in accordance with the "Community Relations in Superfund; A Handbook, Interim Version", Environmental Protection Agency, Office of Emergency and Remedial Response, September, 1983.

To date, little community relations activities involving large groups have been conducted at the Arkwood site. The U.S. EPA, ADPC&E, and MMI representatives have been in contact with one another and with affected individuals. There have not been any public meetings held to date.

All organized groups involved with the community environmental affairs will be identified. Contact will be established and maintained throughout the <u>remedial action</u> portion of the project. Among the other interested parties that will be kept abreast of happenings at the site include:

- o Elected representatives, including state and federal representatives and senators;
- o Arkansas Department of Pollution Control and Ecology;
- o Environmental Protection Agency, Region VI, Dallas, Texas; and
- o Boone County Health Department, Harrison.

Community Relations Plans generally specify two types of techniques to maintain public awareness and to meet the community relations objectives: (1) providing periodic progress reports on the findings of the remedial investigation, and (2) eliciting and documenting comments and concerns from citizens, local officials, and community or environmental groups.

The following techniques, individually or in combination, will be used fulfill the objectives of the community relations plan. Each technique is presented, followed by a discussion of its application purpose.

Technique

Methodology

Briefing of Local and State Officials

In person or by phone. Inform officials of plans and developments on a continuing basis.

Informal public meetings

Informal discussions with groups of concerned citizens, groups, and other identified interested parties, to review major findings, activities, and decisions.

Facts sheets and periodic updates

To be distribute to local residents, at meetings with media, and other appropriate parties (such as environmental groups). Coordinate distribution with other information releases. Invite comments and provide further sources of information where appropriate.

Press releases

To announce milestones in activities or to impart necessary information. Press releases will be concise, timely, and accurate.

Public depository information A repository for site

A repository for site information at a local library, health office, or community center that will contain approved technical documents, official phone numbers, and a copy of the CRP.

Responsiveness summary

Discuss local community concerns, and how the final remedial action decision recognizes and incorporates those community concerns. If the selected alternative does not address community concerns, it will discuss why the local community does not support the selected actions.

Onsite inquiry office

To provide an onsite source of information when findings or significant test results are released or when a great deal of public interest is anticipated.

The objectives of the community relations plan are to:

- o Ensure that local residents, state and local officials, and concerned groups are notified of major findings, activities and the reasons for these activities, and decisions in a timely manner;
- o Provide the media with detailed, accurate information about the remedial investigation and feasibility study;
- o Effectively address citizen inquiries and concerns to ensure that the best possible information is provided. Provide accessible, consistent sources for people to contact and allow an ample time period for the public to response;
- o Provide local residents and state and local officials with the opportunity to comment on remedial action alternatives identified during the feasibility study; and
- o Keep abreast of changes in community concerns, information needs and activities and modify the Community Relations Plan as necessary to address these changes.



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